

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KEISHA WATERS,

Plaintiff,

BRIDGECREST CREDIT COMPANY, LLC,

Defendant.

Civil Case No.: 7:25-cv-03115

NOTICE OF REMOVAL

Defendant Bridgecrest Credit Company, LLC (“Bridgecrest”), by and through its counsel, Husch Blackwell LLP, hereby gives notice of the removal of this action from the Supreme Court of the State of New York, New York County, pursuant to 28 U.S.C. § 1331, § 1441, and § 1446.

1. On or about March 23, 2025, Plaintiff Keisha Waters (“Plaintiff”) commenced this action against Bridgecrest by filing a Complaint in Supreme Court of the State of New York, New York County, Index No. 153803/2025. This matter is captioned *Keisha Waters v. Bridgecrest Credit Company, LLC*. True and correct copies of the following documents are attached hereto as Exhibit A: the docket sheet, Summons, Complaint (including exhibits attached thereto), and all remaining documents.

2. Bridgecrest was served with the Complaint on March 26, 2025.

3. Bridgecrest is filing this notice within thirty (30) days of receipt of the Complaint as allowed by 28 U.S.C. § 1446(b).

4. Plaintiff asserts claims against Bridgecrest under the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.* arising from its alleged inaccurate credit reporting.

5. Pursuant to 28 U.S.C. § 1331, the United States District Courts “have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

6. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff's claims are governed by the FCRA, which is a federal law enacted by Congress.

7. In addition to the federal claims, Plaintiff asserts a defamation claim, as well as a wrongful repossession and collection claim under UCC § 9-611, § 9-613, and § 9-616. Pursuant to 28 U.S.C. § 1367, this Court has supplemental jurisdiction over Plaintiff's state law claims because such claims are so related to the federal claims that they form part of the same case or controversy. Specifically, the federal and state law claims in Plaintiff's Complaint all arise out of the same underlying facts.

8. Based on the foregoing, this Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and § 1367 because it arises under federal law and related state law claims that arise out of the same set of facts.

9. Pursuant to 28 U.S.C. § 1441(a), this case is appropriately removable to federal court.

10. Since the Complaint was originally filed in New York County Supreme Court, venue is proper in the United States District Court for the Southern District of New York.

11. Pursuant to 28 U.S.C. § 1446(d), a true and correct copy of this Notice of Removal will be filed with the Supreme Court of the State of New York, New York County, simultaneously with the filing in this Court.

12. Pursuant to 28 U.S.C. § 1446(d), a true and correct copy of this Notice of Removal will be served upon Plaintiff's counsel.

13. This Notice of Removal is filed subject to and without waiver of any rights Bridgecrest may have with respect to Plaintiff's claims.

WHEREFORE, Bridgecrest respectfully requests that this matter be removed from the Supreme Court of the State of New York, New York County to the United States District Court for the Southern District of New York.

Respectfully submitted,

/s/ Colleen Fox

Colleen Fox

NY Bar No. 5280417

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Attorneys for Defendant

Bridgecrest Credit Company, LLC

Dated: April 15, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing Notice of Removal on the following via electronic and regular mail to:

Brian L. Ponder, Esq.
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Attorney for Plaintiff

/s/ Colleen Fox
Colleen Fox

Dated: April 15, 2025